PUBLIC DISCLOSURE STATEMENT

BELONG

PRODUCT & SERVICE
2019-2020

Australian Government

Climate Active
Public Disclosure Statement

BELONG

An Australian Government Initiative

Climate Active

NAME OF CERTIFIED ENTITY: **BELONG**

REPORTING PERIOD: **1 July 2019 – 30 June 2020**

Declaration

To the best of my knowledge, the information provided in this Public Disclosure Statement is true and correct and meets the requirements of the Climate Active Carbon Neutral Standard.

Signature

Peng Lee

Peng Lee (May 27, 2021 11:49 GMT+10)

Date

27-May-2021

Name of Signatory

Peng Lee

Position of Signatory

Commercial and Vendor Management Lead

Australian Government

Department of Industry, Science, Energy and Resources

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1. CARBON NEUTRAL INFORMATION

Description of certification

Belong exists as a business unit within Telstra and so is not a registered business with its own unique ABN. The **entirety of Belong's emissions footprint** is captured through the combined two Product offerings and business and customer support operations ('Service'). See below for Belong's captured product and service emissions certified as carbon neutral.

Only greenhouse gas (GHG) emissions within our complete operational control relevant to our products and services have been captured in this certification. This approach to GHG accounting enables us to capture emissions for which we have greatest authority to introduce and control reduction policies related to our emissions. The definitions of our products and services are provided below:

"Today, we continue to offer Australians reliable, affordable mobile and internet alongside a hefty dose of social good – to benefit both people and planet."

Product (Fixed)	*The provision of access to the internet via the Belong fixed network and/or NBN*
Product (Mobile)	*The provision of access to the Belong mobile network for the purposes of making and receiving calls and data*
Service (Operations)	*The business and customer support operations of Belong.*

Our approach to GHG emissions accounting has also been underpinned by Belong's organisational relationship with Telstra. Our customers use part of Telstra and NBN networks through our products and services. As such, there is an inherent overlap of emissions that Belong creates with Telstra's network which has been previously captured in Telstra's own carbon neutral certification under the Climate Active Organisation Standard. Under the Climate Active standard, emissions shared between Belong and Telstra can be nullified as carbon neutral under the *Parent-Child relationship* (as per section 2 of the Climate Active Technical Manual). Telstra is the Parent certification in this Parent-Child relationship and this Belong certification captures where the overlap exists.

Functional Units.

The functional unit for the mobile products, fixed networks product and operational services of Belong is the average number of customers connected to the network, otherwise referred to as the 'Services in Operation' (SIO) for the year. For confidentiality reasons we have not disclosed the number of SIO's we have in this report, nor our base year report.

Organisation description

At Belong we acknowledge the First Peoples of Australia as traditional owners and custodians of the land and waters. We are committed to learning from indigenous wisdom. We use this to shape our thinking and our actions. We humbly pay respects to their Elders past, present and emerging. We respect the First Nations principle of caring for Mother Earth, and only taking what we need. This principle shapes our actions and the ways in which we design and manage our operations.

Belong was established in October 2013 with the purpose of helping Australians access great value home internet. A few years later, we started offering no lock-in mobile services to get even more Australians connected. Today, we continue to offer Australians reliable, affordable mobile and internet alongside a hefty dose of social good – to benefit both people and the planet.

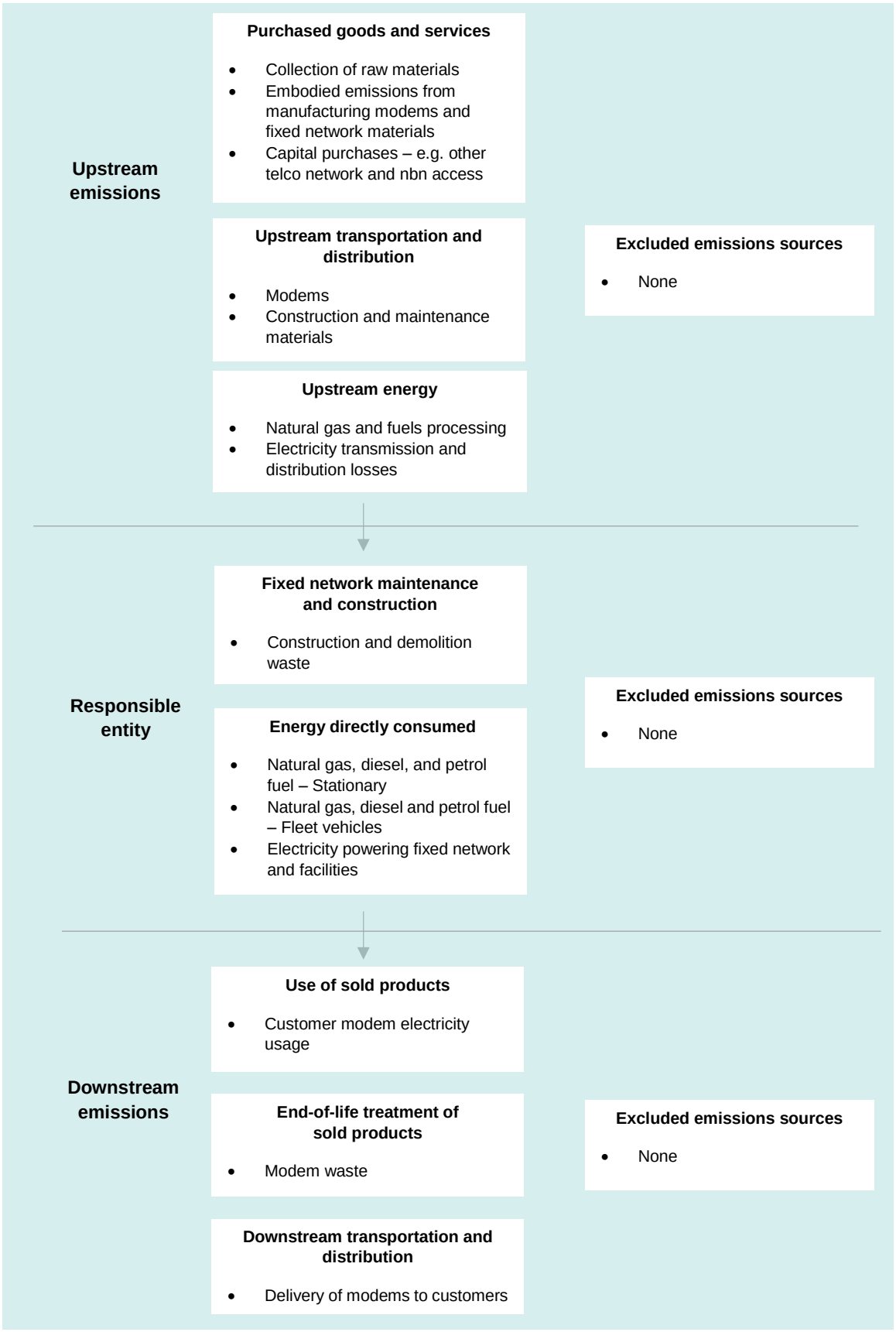
In 2019, we achieved our base year carbon neutral certification for our award-winning products and services and this year represents our first full reporting period. We understand that internet and mobile companies are major contributors of the world's GHG gases which is why we firmly believe in the potential to change that narrative by providing telecommunications and IT services to connect people and businesses in ways that reduce carbon emissions – without offloading extra costs to our customers. We have taken this certification a step further by creating the Carbon Thumbprint campaign and related mobile app to help individuals become aware of and estimate their portion of the CO_2 created by their mobile network data usage. This enables our customers to act on managing their mobile data impact.

Our strategy for delivering value to both our key stakeholders and the planet is focused on providing simple and reliable products and services while actively investing in local and internationally certified renewable energy projects.

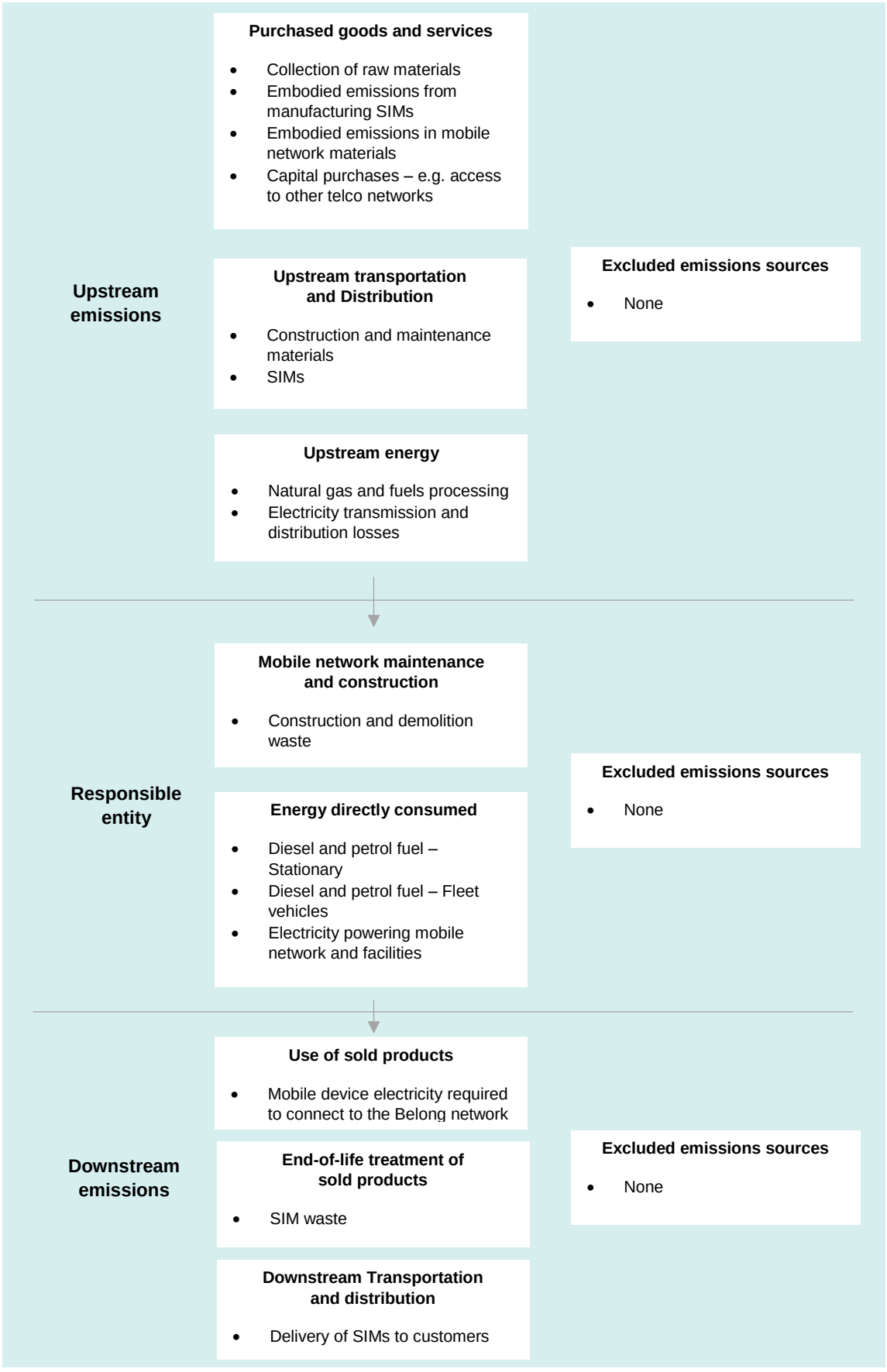
Product/service process diagrams

The following diagrams are cradle-to-grave and represent all attributable emissions sources in the products and service lifecycles. See section thereafter for understanding of any non-attributable processes.

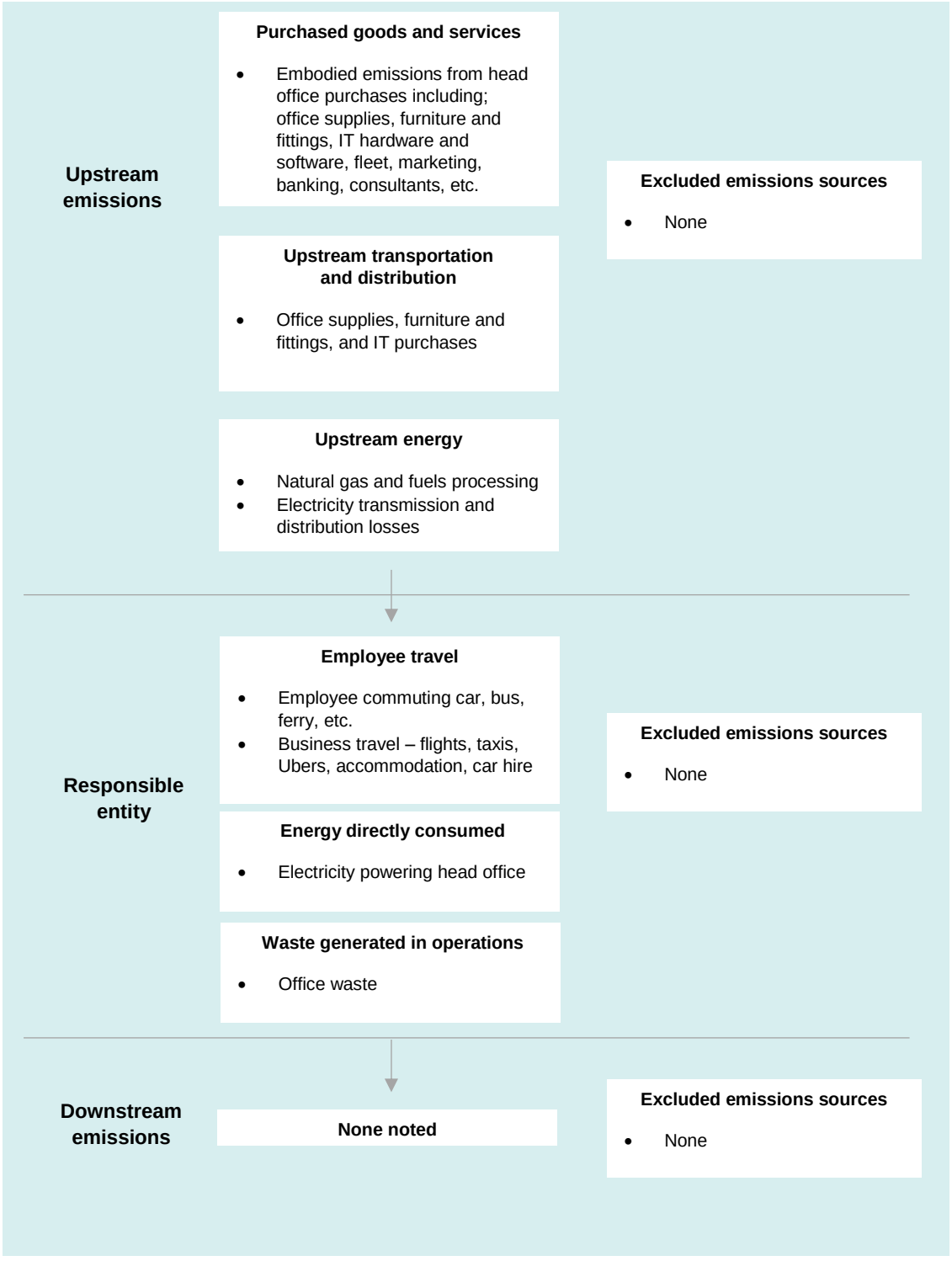
Belong Fixed Product process diagram



Belong Mobile Product process diagram



Belong service operations process diagram



2. EMISSION BOUNDARY

Diagram of the certification boundary

Belong Fixed Product Boundary

Quantified

Collection of raw material

Embodied emissions from manufacturing modems and fixed network materials

Capital purchases e.g. other telco network and nbn access

Upstream and downstream transportation and distribution of modems

Upstream transportation and distribution of construction and maintenance materials

Upstream energy (Natural gas and fuels processing, and electricity transmission and distribution losses)

Fixed network construction & demolition waste

Energy directly consumed (Natural gas, diesel, and petrol fuel – both stationary and fleet vehicles)

Electricity powering fixed network and facilities

Customer modem electricity usage

End of life - Modems waste

Non-quantified

None noted

Excluded

None noted

Non-attributable

Waste generated in operations (hazardous waste)

Belong Mobile Product Boundary

Quantified

Embodied emissions from manufacturing SIMs and mobile network materials

Capital purchases e.g. access to other telco networks.

Upstream and downstream transportation and distribution of SIMs and network materials

Upstream energy (Natural gas and fuels processing, and electricity transmission and distribution losses)

Mobile network construction and demolition waste

Energy directly consumed (Natural gas, diesel, and petrol fuel – both stationary and fleet vehicles)

Electricity powering the mobile network and facilities

Mobile device electricity usage required to connect to the Belong mobile network

End of life waste for SIMs

Non-quantified

None noted

Excluded

None noted

Non-attributable

Mobile device electricity for use outside of connecting to the Belong network (e.g. apps, displaying video, camera)

Business waste – mobile devices

Embodied emissions – mobile devices

Waste generated in operations (hazardous waste)

Belong Service Operations Boundary

Quantified

Embodied emissions from head office purchases including – office supplies, furniture & fittings, IT software & hardware, consulting, marketing etc

Upstream transportation of office supplies, furniture & fittings, and IT purchases etc

Upstream energy (electricity transmission and distribution losses)

Office waste

Employee commuting

Business travel, accommodation, car hire, flights, taxis, and Ubers.

Electricity powering head office

Non-quantified

None noted

Excluded

None noted

Non-attributable

Telstra Investments

Telstra's international leased assets

Attributable non-quantified sources

We have no emissions sources that satisfy the below attributable non-quantified criteria.

Excluded sources (within certification boundary)

We have no emissions that meet the exclusion rules of s2.3.1 and 2.6 of the Climate Active Carbon Neutral Standard for Products & Services.

For transparency, in the base year certification business travel accommodation and car hire were listed as excluded (as immaterial) sources of emissions. These have now been included as attributable and quantified in this certification.

"Ensuring technology and connectivity benefits everyone and are useful in tackling some of the world's biggest challenges and to continue to have - central in our business - a focus

Non-attributable sources (outside certification boundary)

The below emission sources are non-attributable sources as they fall outside the emissions boundaries based on application of the relevance test of s2.3 of the Climate Active Carbon Neutral Standard for Products & Services (see more at appendix 1):

- The emissions from a particular source do not contribute to our greenhouse gas risk exposure.
- Key stakeholders do not deem the emissions relevant to our products & service boundaries.
- The emissions are not from outsourced activities previously undertaken by Belong or comparable products & services.

Product / Service	Emissions Source	Justification
(Product) Mobile	Business waste – mobile devices	Belong do not sell mobile devices and so this is not part of the value chain. Only SIM cards are sold. Therefore, Belong do not have a material ability to influence the efficiency / design of mobile devices given no material relationships with mobile device manufacturers.
(Product) Mobile	Mobile device electricity usage – functionality and apps etc.	Belong does not sell or provide mobile devices and so associated emissions are outside of our control. As noted in the above diagram, we do however include a small amount of mobile device electricity usage that relates to energy required to connect the SIM to our network and upload/download data. All other use of the device thereafter (e.g. apps, display video, camera) is non-attributable.

(Product) Mobile and Fixed	Hazardous waste	The Australian Government Department of Industry, Innovation & Science defines hazardous waste under Annex III to the Basel Convention (1992). These characteristics include: • Explosive; • Flammable Liquids/Solids; • Poisonous; • Toxic; • Ecotoxic; and • Infectious Substances Belong does not create or store any of the above waste as a result of operations or running the network.
(Service) Operations	Telstra investments	Belong is a business unit of Telstra and not a registered entity. Therefore, Belong does not hold any investments. The investments which Telstra hold are irrelevant to Belong's boundary as they relate primarily to international network investments.
(Service) Operations	Telstra's international leased assets	Belong's products and services are only provided to domestic customers. Therefore, emissions related to Telstra's international leased assets are deemed not applicable. For transparency however, these international leased assets are fully captured by Telstra's Climate Active Organisation Standard certification.

3. EMISSIONS SUMMARY

Emissions reduction strategy

We take this responsibility seriously because we recognise the impact our business has on the environment and the risks that climate change poses for our business. As the first telecommunications business to become carbon neutral certified, we approach our reduction strategy with a focus on innovative solutions, given there are few precedents to leverage. This strategy also overlaps with Telstra's public commitments towards the following climate goals:

- Be **carbon neutral** in our operations by 2020
- Be renewable leaders by enabling renewable energy generation **equivalent to 100% of our consumption by 2025**
- **Reduce** our absolute scope 1 and 2 **emissions by at least 50% by 2030**

Belong's ability to achieve material reductions in gross emissions is clearly linked to electricity consumption for powering the network and powering customer modems (~52% of current emission profile). While the carbon intensity of the Australian grid is reducing (as a function of a higher renewables contribution), it is still likely that our increased energy consumption will be reflected in an upward trajectory in gross emissions as the business grows. Belong's emissions reduction targets are focused in two main areas:

1. Continual improvement in energy efficiency of network hardware and customer modems; and
2. Sourcing a greater proportion of total energy from renewable sources.

This could also be achieved by forming strong partnerships with third parties like manufacturers, government departments, electricity retailers and/or generators, and utilising existing (or promoting and assisting new) carbon neutral organisations and products. Finally, we seek to engage and empower our customers, employees and partners to take proactive steps to assess and reduce their environmental footprint, and work with us to generate positive environmental and social outcomes.

Functional Units

Table 1

	Number of functional units
a) Number of functional units (customers) during the period	*Commercial-in-confidence*
b) Number of functional units to be forward offset demonstrating commitment to carbon neutrality (true-up to be conducted at the end of the reporting period)	*Commercial-in-confidence*

Emissions over time

Table 2

Emissions since base year		
	Base year: 2018-19	Current year 2019-20
tCO2e – Fixed Product	113,912	130,571
tCO2e – Mobile Product	3,560	5,413
tCO2e – Operations Service	13,000	11,336
Total Belong tCO2-e	**130,472**	**147,320**

tCO2e – Parent-Child overlap*	N/A*	(109,082)
Total tCO2-e to be offset	**130,472**	**38,238**

* During the current year Telstra has become certified carbon neutral under the Organisation Standard. The Climate Active Parent Child rules allows for any overlap between the Telstra and Belong certifications to be nullified. At the time of Belong's base year 2018-19 certification, Telstra was not yet certified carbon neutral under the Climate Active Organisation Standard. Therefore this overlap is only relevant for the current year 2019-20.

Telstra is the parent in this relationship and in Table 4 we have demonstrated where emissions boundaries overlap so to avoid double counting of offsets for the FY20 year. The Belong emissions that do not overlap with Telstra largely relate to upstream and downstream emissions associated with product / service manufacture, transportation, and customer use.

Emissions reduction actions

Emissions reduction activities – year ended 30 June 2020[1]

Table 3

Emission source	Description	FY 20 Annual savings ($tCO2_e$-)
HVAC optimisation	Conduct physical inspections of network sites to identify faults affecting power consumption and review equipment performance to identify optimisation opportunities.	435
Upgrading rectifiers	Rectifiers convert electricity from AC mains power to DC power, which is required to run our telecommunications equipment. We continue to upgrade older inefficient units to more modern, high efficiency rectifiers. These are now achieving efficiency levels of 96-98 percent	24
Total		459

[1]This is a proportion share of Telstra's emission reductions

Emissions summary (inventory)

Table 4

These tables detailed our emissions per product / service for the 12 months ended 30 June 2020.

Service operations

Emission source category	tonnes CO_2-e	Overlap with Telstra %	Offset for FY20 (tonnes CO_2-e)

Purchased goods & services (embodied emissions)	6,442	23%	4,961
Capital goods (embodied emissions)	4,050	82%	715
Transportation & distribution (logistics diesel / petrol). This includes upstream fuel processing	411	22%	322
Waste generated in operations	26	100%	0
Business travel	193	100%	0
Employee commuting	214	100%	0
1. *Total inventory emissions*	**11,336**		**5,998**
a) *Number of functional units represented by the inventory emissions*	*Commercial in confidence*		*Commercial in confidence*
2. *Emissions per functional unit.*			
3. *Carbon footprint*	**11,336**		**5,998**

Fixed Product network

Emission source category	tonnes CO_2-e	Overlap with Telstra %	Offset for FY20 (tonnes CO_2-e)
Fuel (natural gas, diesel, petrol)	2,741	100%	0
Electricity (purchased from the grid)	75,177	100%	0
Purchased goods & services (embodied emissions)	2,835	23%	2,183
Capital goods (embodied emissions)	14,348	82%	2,532
Fuel & energy related. Fuel extraction (natural gas, diesel, petrol) and transmission and distribution losses (electricity)	10,817	100%	0
Transportation (logistics diesel / petrol)	2,344	22%	1,835
Use of sold products: modems & ethernet cables (electricity purchased from grid)	22,309	0%	22,309
End-of-life treatment: modems & ethernet cables (waste)	0	100%	0
1. *Total inventory emissions*	**130,571**		**28,859**
a) *Number of functional units represented by the inventory emissions*	*Commercial in confidence*		*Commercial in confidence*
2. *Emissions per functional unit.*			
3. *Carbon footprint*	**130,571**		**130,571**

Mobile Product network

Emission source category	tonnes CO_2-e	Overlap with Telstra %	Offset for FY20 (tonnes CO_2-e)

Fuel (natural gas, diesel, petrol)	30	100%	0
Electricity (purchased from the grid)	829	100%	0
Purchased goods & services (embodied emissions)	1,326	23%	1,021
Capital goods (embodied emissions)	612	82%	108
Fuel & energy related emissions	119	100.0%	0
Transportation (logistics diesel / petrol)	1,124	21%	879
End-of-life treatment: SIMs (waste)	0	100.0%	0
Use of sold products	1,373	0%	1,373
1. Total inventory emissions	**5,413**		**3,381**
a) Number of functional units represented by the inventory emissions	*Commercial in confidence*		*Commercial in confidence*
2. Emissions per functional unit.			
3. Carbon footprint	**5,413**		**3,381**

Carbon neutral products

None were used in FY20.

4. CARBON OFFSETS

In our Base Year certification Belong adopted an arrears offsetting approach. This is our first full reporting year and so the first time we have disclosed offset purchases that were made in the mid 2020 financial year for the Base Year. Offsets have also been purchased to ensure we are carbon neutral for the reporting year for the 12-month period ending 30 June 2020. We have also only offset the residual emissions that do not overlap with the Telstra Organisation Standard certification, as in line with the Climate Active Parent-Child relationship guidance.

Our offsets have been purchased in line with Appendix A of the Standard and include a mix of the following:

- Verified Carbon Units (VCUs) issued by the Verified Carbon Standard; and
- Australian Carbon Credit Units (ACCUs) issued by the Clean Energy Regulator in accordance with the framework established by the *Carbon Credits (Carbon Farming Initiative) Act 2011*

Offset purchasing strategy: In arrears

1. Total offsets required for this report	38,238 (this is the post Telstra overlap figure under the *Parent-Child* rules) plus 130,472 owing from the 2018-19 report
2. Offsets retired in previous reports and used in this report	0
3. Net offsets required for this report	168,710

Project description	**Type of offset units**	**Registry**	**Date retired**	**Serial number (and hyperlink to registry transaction record)**	**Vintage**	**Quantity (tonnes CO2-e)**	Quantity used for previous report **(2018-19)**	**Quantity used in this report (2019-20)**	**Quantity banked for future years (2020-21)**
300MW Hydropower project by JHPL	VCUs	VERRA	6 March 2020	Total offsets purchased by Telstra (Belong): 28,753 Serial number of purchase: 7919-440854867-440882604-VCU-001-MER-IN-1-92-01012013-30062013-0 https://registry.verra.org/myModule/rpt/myrpt.asp?r=206&h=31098	01/01/2013 - 30/06/2013	27,738	21,451	6,287	0
Jiangsu Dongtai Phase II Wind Power Project	VCUs	VERRA	5 March 2020	Total offsets purchased by Telstra (Belong): 256,247 Serial number of purchase: 7610-410818411-410951342-VCU-034-APX-CN-1-1356-01062014-31122014-0 https://registry.verra.org/myModule/rpt/myrpt.asp?r=206&h=29403	01/06/2014 - 31/12/2014	132,932	102,804	30,128	0
Savanna Burning Investment Ready Project – Cape York Pilot Aurukun	ACCU	ANREU	16 December 2019	Total offsets purchased by Telstra (Belong): 500 Serial number of purchase: 3786111732-3786111990 http://www.cleanenergyregulator.gov.au/OSR/ANREU/Data-and-information	2019-20	259	200	59	0
Negros Island Solar Power Inc.	VCUs	VERRA	6 March 2020	Total offsets purchased by Telstra (Belong): 15,000 Serial number of purchase: 5921-266979053-266994052-VCU-029-APX-PH-1-1735-01012017-25112017-0 https://registry.verra.org/myModule/rpt/myrpt.asp?r=206&h=27623	01/01/2017 - 25/11/2017	7,781	6,017	1,764	0

Total offsets retired this report and used in this report and last report	168,710
Total offsets retired this report and banked for future reports	0

Co-benefits

Our offset strategy is focused on projects that:

- support renewable energy given electricity is the largest component of our emissions footprint; and
- connect to communities within our value chain and indigenous communities.

As we continue to develop our carbon offset portfolio we are actively looking for opportunities to be an enabler of energy efficient solutions, innovation, and capacity with our partners.

Offset Project	Co-benefits Description
300MW Hydropower project by JHPL	Generates electricity using renewable hydro energy and sell it to Himachal Pradesh State Electricity Board (HPSEB), with a strong focus on sustainable implementation of the development project.
Jiangsu Dongtai Phase II Wind Power Project	Utilises wind resources to generate 406,200MWh of renewable electricity annually for sale into the East China Power Grid to reduce demand for electricity generated by coal fire plants and thereby mitigating carbon emissions.
Savanna Burning Investment Ready Project – Cape York Pilot Aurukun	Involves strategic and planned burning of savanna areas in the high rainfall zone during the early dry season to reduce the risk of late dry season wild fires. This also supports Indigenous communities.

5. USE OF TRADEMARK

Table 7

Description where trademark used	Logo type
Website	Certified product/service
Email signature	Certified product/service
LinkedIn	Certified product/service
Carbon Thumbprint mobile app and campaign	Certified product/service
Other advertising and public relations material	Certified product/service

APPENDIX 1

Non-attributable emissions for products and services

To be deemed attributable an emission must meet two of the five relevance criteria. Non-attributable emissions are detailed below against each of the five criteria.

Table 8

Relevance test						
Non-attributable emission	*The emissions from a particular source are likely to be large relative to the organisation's electricity, stationary energy and fuel emissions*	*The emissions from a particular source contribute to the organisation's greenhouse gas risk exposure.*	*Key stakeholders deem the emissions from a particular source are relevant.*	*The responsible entity has the potential to influence the reduction of emissions from a particular source.*	*The emissions are from outsourced activities previously undertaken within the organisation's boundary, or from outsourced activities typically undertaken within the boundary for comparable organisations.*	*Description*
(Product – Mobile) Mobile device electricity for use outside of connecting to the Belong network (e.g. apps, displaying video, and camera)	Yes	No	No	No	No	Belong do not sell mobile devices and so this is not part of our value chain. Only SIM cards are sold. Therefore, Belong do not have a material ability to influence the efficiency / design of mobile devices given no material relationships with mobile device manufacturers. As noted above in our mobile product diagram we have however included a small proportion of customer electricity usage that represents network access.
(Product – Mobile) Business waste – mobile device	Yes	No	No	No	No	As above
(Product – Mobile) Embodied emissions – mobile device	Yes	No	No	No	No	As above
(Service – Operations) Hazardous Waste	No	No	No	No	No	The Australian Government Department of Industry, Innovation & Science defines hazardous waste under Annex III to the Basel Convention (1992). These characteristics include:

						• Explosive; • Flammable Liquids/Solids; • Poisonous; • Toxic; • Ecotoxic; and • Infectious Substances Belong does not create or store any of the above waste as a result of operations or running the network.
(Service – Operations) Telstra Investments	Yes	No	No	No	No	Belong is a business unit of Telstra and not a registered entity. Therefore, Belong does not hold any investments. The investments which Telstra hold are irrelevant to Belong's boundary as they relate primarily to international network investments. In addition, Belong has limited ability to influence Telstra's investment decisions and subsequently the carbon impact of these investments.
(Service – Operations) Telstra's international leased assets	No	No	No	No	Yes	Belong's products and services are only provided to domestic customers. Therefore, emissions related to Telstra's international leased assets are deemed not applicable. For transparency however, these international leased assets are fully captured by Telstra's Climate Active Organisation certification.

APPENDIX 2

Non-quantified emissions for products/services

Please advise which of the reasons applies to each of your non-quantified emissions. You may add rows if required.

Table 9

Non-quantification test				
Relevant-non-quantified emission sources	*Immaterial* *<1% for individual items and no more than 5% collectively*	*Quantification is not cost effective relative to the size of the emission but uplift applied.*	*Data unavailable but uplift applied.* *A data management plan must be put in place to provide data within 5 years.*	*Initial emissions non-quantified but repairs and replacements quantified*
None noted	n/a	n/a	n/a	n/a